

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION
Civil Action No. 5:23-CV-00030**

**ALISON SCHULTZ, individually, and on
behalf of all others similarly situated,**

Plaintiff,

v.

**PLANET AUTOMOTIVE GROUP, LLC,
PLANET AUTOMOTIVE GROUP
HICKORY LLC**

and

**HELM TECHNOLOGIES, LLC d/b/a
CHATTERSPOT,**

Defendants.

Proposed Amended Scheduling Order

NOW COME Counsel for Plaintiff and Defendants, pursuant to the Court's November 15, 2023 text order, and respectfully submit the following Proposed Amended Scheduling Order.

Event	Date
Rule 26 Disclosures	January 25, 2024
Plaintiff's Expert Report	June 17, 2024
Defendants' Expert Reports	July 17, 2024
Mediation Report	May 15, 2024
Completion of Discovery	August 15, 2024
Filing of Class Certification Motions	March 15, 2024
Filing of Dispositive Motions	September 1, 2024
Trial Term	December 2, 2024

This, the 15th day of December, 2023

/s/ Christopher E. Roberts

Christopher E. Roberts
Butsch Roberts & Associates
231 S. Bemiston Avenue, Suite 260
Clayton, Missouri 63105
croberts@butschroberts.com
Counsel for Plaintiff

Craig Shapiro
N.C. State Bar No. 48887
Shapiro Law Office PLLC
644 Holly Springs Road, Suite 195
Holly Springs, North Carolina 27540
craig@shapirolawofficepllc.com
Counsel for Plaintiff

/s/ Elizabeth Vennum

Elizabeth Vennum
N.C. State Bar No. 49747
Hull & Chandler
1009 East Boulevard
Charlotte, NC 28203
Tel. (704) 375-8488
Fax (704) 375-8487
lvennum@lawyercarolina.com
Counsel for the Planet Automotive Defendants

/s/ Christopher Bradley Clare

Christopher Bradley Clare
N.C. State Bar No. 39582
Clark Hill Plc
1001 Pennsylvania Ave. NW
Ste 1300 South
Washington, DC 20004
cclare@clarkhill.com
Counsel for Defendant Helm Technologies LLC

Certificate of Service

This is to certify that on this date the undersigned filed the foregoing using the Court's CM/ECF system which will send notification of such filing to the following CM/ECF participants:

Craig Shapiro
Shapiro Law Office PLLC
644 Holly Springs Road, Suite 195
Holly Springs, North Carolina 27540
craig@shapirolawofficepllc.com

Christopher E. Roberts
Butsch Roberts & Associates
231 S. Bemiston Avenue, Suite 260
Clayton, Missouri 63105
croberts@butschroberts.com

Christopher Bradley Clare
Clark Hill Plc
1001 Pennsylvania Ave. NW
Ste 1300 South
Washington, DC 20004
cclare@clarkhill.com

This the 15th day of December, 2023.

Hull & Chandler

By: /s/ Elizabeth Vennum
Elizabeth Vennum